

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

MARK ULIANO,  
Plaintiff  
  
v.  
  
MARIE H. BISSEL and  
KENNETH J. TILDEN,  
Defendants

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) CIVIL ACTION NO. 04 10797 GAO  
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DISTRICT COURT  
DISTRICT OF MASS.

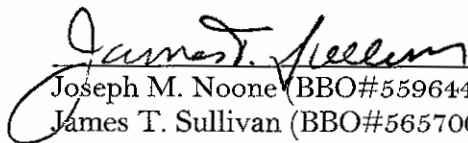
**DEFENDANT, KENNETH J. TILDEN'S EXPERT DISCLOSURE**  
**PURSUANT TO FED. R. CIV. P. 26(a)(2)**

NOW comes the defendant, Kenneth J. Tilden, and files the within Expert Disclosure as follows:

1. Defendant, Kenneth J. Tilden, may or will call Robert R. Pennell, M.D., 225 Boston Street, Lynn, MA 01904 to testify as a medical expert witness in his behalf.
2. Dr. Pennell's curriculum vitae is attached hereto as Exhibit "A."
3. Dr. Pennell's report dated August 16, 2005 on his examination of plaintiff is attached hereto as Exhibit "B."
4. It is anticipated that at trial, Dr. Pennell will testify in accordance with his report (Exhibit "B" hereto) and that his opinions rendered while testifying will be based upon his education, experience, examination of the plaintiff and review of the plaintiff's medical records, as is set forth in Exhibit "B".

KENNETH J. TILDEN

By his attorneys,

  
\_\_\_\_\_  
Joseph M. Noone (BBO#559644)  
James T. Sullivan (BBO#565700)  
AVERY, DOOLEY, POST & AVERY, LLP  
90 Concord Avenue  
Belmont, MA 02478  
(617) 489-5300

Dated: August 24, 2005

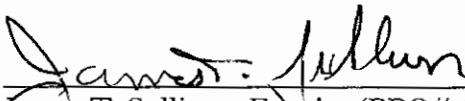
**CERTIFICATE OF SERVICE**

I, James T. Sullivan, hereby certify that I have this 24<sup>th</sup> day of August, 2005, forwarded the within document to all counsel of record by delivering same, first class mail, postage prepaid, to:

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